

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

**JESSICA JONES, et al.,**

Plaintiffs,

v.

**VARSITY BRANDS, LLC, et al.**

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

**JURY DEMAND**

---

**DECLARATION OF DAVID SEIDEL IN SUPPORT OF PLAINTIFFS' MOTION TO  
COMPEL 30(b)(6) DEPOSITION TESTIMONY FROM DEFENDANTS  
CHARLESBANK CAPITAL PARTNERS LLC AND BAIN CAPITAL PRIVATE  
EQUITY**

---

I, David Seidel, declare the following under penalty of perjury:

1. I am an associate at the Joseph Saveri Law Firm, LLP ("JSLF"), counsel for Plaintiffs Jessica Jones and Christina Lorenzen ("Plaintiffs") in *Jones, et al. v. Bain Capital Private Equity, at el.*, case no. 2:20-cv-02892-SHL-tmp. I am a member in good standing of the State Bar of California and have been admitted *pro hac vice* in this Court. I am over 18 years of age and have personal knowledge of the facts stated in this Declaration. If called as a witness, I could and would testify competently.

2. On May 6, 2022, I spoke to Mr. Kaiser by phone to discuss our proposal for a limited set of 30(b)(6) topics. Defendants would not agree to any 30(b)(6) testimony and the parties could not come to an agreement. Defendants' counsel took the position that the Court's April 11, 2022 Order, ECF No. 261, denied Plaintiffs' request for 30(b)(6) testimony, and that they had never agreed to any 30(b)(6) testimony. Defendants' counsel suggested that Defendants

might be willing to provide written testimony to one topic, but could not propose anything definitive.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed May 19, 2022 in San Francisco, California.

/s/ David Seidel

David Seidel